

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

)	
IN RE PHARMACEUTICAL INDUSTRY)	MDL NO. 1456
AVERAGE WHOLESALE PRICE)	
LITIGATION)	CIVIL ACTION NO. 01-CV-12257-PBS
)	
)	Hon. Patti B. Saris
THIS DOCUMENT RELATES TO)	
CLASS 1 JURY TRIAL)	
)	

**DEFENDANT ASTRAZENECA PHARMACEUTICALS LP'S OBJECTIONS TO
PLAINTIFFS' DISCLOSURES FOR CLASS 1 ASTRAZENECA TRIAL**

In addition to the objections enumerated below, AstraZeneca objects to the introduction into evidence at trial of any documents or testimony that fall within the scope of the Motions in Limine filed by AstraZeneca on March 23, 2007.¹ AstraZeneca also reserves the right to supplement and/or amend these objections based on any rulings by the Court prior to trial.

¹ On March 23, 2007, AstraZeneca filed the following motions in limine (“MIL”):

- Defendant AstraZeneca Pharmaceuticals LP’s Motion in Limine to Exclude Evidence Not Pertaining to Claims of Class Representatives Mr. Howe and Mr. Townsend (Docket #s 3928, 3929);
- Defendant AstraZeneca Pharmaceuticals LP’s Motion in Limine to Exclude Evidence Relating to Profits or Revenue of AstraZeneca Pharmaceuticals LP From the Liability Trial (Docket #s 3930, 3931);
- Defendant AstraZeneca Pharmaceuticals LP’s Motion in Limine to Exclude the 2003 Office of Inspector General Guidelines (Docket #s 3932, 3933);
- Defendant AstraZeneca Pharmaceuticals LP’s Motion in Limine to Exclude Testimony and Evidence Concerning Aggregate Damages (Docket #s 3934, 3935);
- Defendant AstraZeneca Pharmaceuticals LP’s Motion in Limine to Preclude Admission of Documents and Testimony of Other Pharmaceutical Companies (Docket #s 3936, 3937); and
- Defendant AstraZeneca Pharmaceuticals LP’s Motion in Limine to Exclude Evidence Relating to Guilty Pleas, Civil Settlement and Sampling Activity (Docket #s 3938, 3939, 3940).

As noted below, AstraZeneca also intends to file a motion in limine relating to Plaintiffs' belated addition of Stuart Fullerton, Senior Litigation Counsel at AstraZeneca, to their witness list.

I. WITNESSES

AstraZeneca objects to Plaintiffs' request, purportedly pursuant to Rule 45, that AstraZeneca identify and produce the officers at AstraZeneca most knowledgeable about certain enumerated topics to testify at trial in Plaintiffs' case. Plaintiffs have taken numerous depositions of AstraZeneca employees, including several pursuant to Rule 30(b)(6), during which they have had ample opportunity to identify those witnesses whose testimony they believe to be relevant to this trial. Plaintiffs should not be permitted to shift the burden of preparing their case to AstraZeneca.

AstraZeneca also objects to Plaintiffs' belated and untimely inclusion of Stuart Fullerton, Senior Litigation Counsel at AstraZeneca, on their witness list. As his title suggests, Mr. Fullerton's role at AstraZeneca is to provide legal advice to the Company in connection with pending or threatened litigation. As such, any testimony he could provide related to Plaintiffs' claims would be privileged. Plaintiffs are well aware of this fact; indeed, their prior attempts to depose Mr. Fullerton were rejected by Magistrate Judge Bowler. (*See* Transcript of Hearing (May 17, 2005) at 14-15; 9/29/05 Docket Entry denying Plaintiffs' Motion to Compel and Granting AstraZeneca's Cross Motion for Protective Order.) There are no grounds to re-visit that decision now. Accordingly, AstraZeneca intends to file a supplemental motion in limine to preclude Plaintiffs from calling Mr. Fullerton as a witness.

II. EXHIBITS

AstraZeneca reserves the right to supplement and/or amend the objections asserted below relating to documents bearing “TAP” production numbers. AstraZeneca does not have copies of these documents and has not been provided with copies by Plaintiffs. It is AstraZeneca’s understanding, upon information and belief, that AstraZeneca has been deprived of the opportunity to review these documents prior to the deadline for submission of objections because these documents were produced by TAP in connection with separate litigations relating to Lupron and are therefore subject to protective orders entered in those cases. On that ground alone, these documents should be excluded from evidence. In order to preserve its rights, however, AstraZeneca asserts certain objections below that are apparent from the descriptions included in Plaintiffs’ disclosures.

Ex.	Prod. No.	Date	Description	Objections
1		6/20/03	Memorandum of Plea Agreement in <i>United States v. AstraZeneca Pharmaceuticals, LP</i> , Criminal Action No. 03-55 (D. Del.)	FRE 402 FRE 403
2			Information filed by the U.S. Attorney in <i>United States v. AstraZeneca Pharmaceuticals, LP</i> , Criminal Action No. 03-55 (D. Del.)	FRE 402 FRE 403
3		6/20/03	Transcript of the Plea and Sentencing Hearing before Honorable Joseph J. Farnan in <i>United States v. AstraZeneca Pharmaceuticals, LP</i> , Criminal Action No. 03-55 (D. Del.)	FRE 402 FRE 403

Ex.	Prod. No.	Date	Description	Objections
4	BERKMAN 0204-05	5/19/03	Information filed by the U.S. Attorney in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	FRE 402 FRE 403
5		7/17/03	Transcript of the Plea Hearing conducted by Honorable Joseph J. Farnan, Jr. in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	FRE 402 FRE 403
6		4/19/04	Examples of Zoladex labels presented as Exhibits at the Ohio State Licensing Board Hearing for Robert A. Berkman, M.D.	FRE 402 FRE 403
7		9/18/04	Information filed by the U.S. Attorney in <i>United States v. Saad Antoun, M.D.</i> , Criminal Action No. 02-13 (D. Del.)	FRE 402 FRE 403
8		9/18/02	Memorandum of Plea Agreement in <i>United States v. Saad Antoun, M.D.</i> , Criminal Action No. 02-13 (D. Del.)	FRE 402 FRE 403
9	BERKMAN 0212-21	5/16/03	Memorandum and Pleas Agreement in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	FRE 402 FRE 403
10	HOPKINS 0122-25	9/18/02	Superseding Information filed by the U.S. Attorney in <i>United States v. Stanley C. Hopkins, M.D.</i> , Criminal Action No. 02-127 (D. Del.)	FRE 402 FRE 403

Ex.	Prod. No.	Date	Description	Objections
11		12/17/02	Memorandum and Pleas Agreement in <i>United States v. Stanley C. Hopkins, M.D.</i> , Criminal Action No. 02-127 (D. Del.)	FRE 402 FRE 403
12		11/6/03	Transcript of Sentencing Hearing in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	FRE 402 FRE 403
13		2/5/04	Letter from Judge Joseph J. Farnan, Jr. to the State Medical Board of Ohio	FRE 402 FRE 403
14	AZ0237142-163	11/3/95	Memorandum from Market Strategy & Contract Operations and the Zoladex Marketing Team	No Objection
15	AZ0431807-811	10/19/00	E-mail from Margaret Hammons to George Gerhart III	No Objection
16	AZ0428379-381	3/20/98	Letter to Eric Kraeutler from Gregory M. Sleet	FRE 402 FRE 403
17	AZ0465663-665	11/30/01	E-mail exchange re: Drug Topics Red Book and PDR.	No Objection
18	AZ0425759-762	5/20/02	Fax & Letter to Jack C. Dodds from Virginia Gibson-Mason re: AstraZeneca	FRE 402 FRE 403
19	AZ0021762-765	1/23/96	Internal memorandum from Keith Patterson to Chris Iacono	No Objection
20	AZ0237142-163	11/3/95	Memorandum from Market Strategy & Contract Operations Zoladex Marketing Team to Chris Iacono.	No Objection
21	AZ0425748-758	4/02/02	Memorandum from Stuart Fullerton to Glenn Englemann	FRE 402 FRE 403 FRE 408

Ex.	Prod. No.	Date	Description	Objections
22	AZ0425779-784	01/18/02	Fax & Letter to John C. Dodds from Virginia Gibson-Mason re: AstraZeneca	FRE 402 FRE 403 FRE 408
23	AZ0425819-823	10/17/00	Fax & Letter to Eric Kraeutler from Virginia Gibson-Mason re: AstraZeneca	FRE 402 FRE 403
24	AZ0435202-212	5/15/01	Fax from Judy Roberts to Carol Flanagan	No Objection
25	AZ0435213-214	5/18/01	Fax to First Data Bank attaching AstraZeneca Revised Price List	FRE 402 FRE 403
26	AZ0428379-381	03/20/98	Letter to Eric Kraeutler from Virginia Gibson-Mason re: Subpoena addressed to Zeneca, Inc.	FRE 402 FRE 403
27	AZ0080413-417	11/3/95	Memorandum from Market Strategy & Contract Operations to Chris Iacono re: Zoladex Pricing and Volume Discount Strategy	No Objection
28	AZ0036643	4/22/96	Memorandum from Paula Jordon to Fred Roberts re: Zoladex (goserlin acetate) Projects; Invoices dated 4/15/96 (no bates numbers)	No Objection
29	AZ0036585	1/29/96	Letter from Paula Jordon	No Objection
30	AZ0465663-665	11/30/01	E-mail from John Freeberry to Mark Boyer	No Objection
31	AZ0473119	11/27/02	E-mail from Janet Rosenberg to Traci Kellam	FRE 402
32	AZ0433750-756	2/27/02	E-mail from Monique Loeffert to Debra Ann Ivey	FRE 402
33	AZ0437459-460	1/3/99	E-mail from Barbara Villani to Joseph Mansfield	FRE 402
34	AZ0426708, 0426710-13	7/14/97	E-mail from Kaylor Kowash to Rickards, Arenson and Caswell	FRE 402

Ex.	Prod. No.	Date	Description	Objections
35	AZ0428299-304	11/24/97	Subpoena to Zeneca, Inc. issued by Michael Little, Regional Inspector General for Investigations	FRE 402 FRE 403
36	AZ0017129	7/26/96	Memorandum from MRP to Zeneca File re: Conversation with Mark Reisenauer 7/19/96	FRE 802
37	AZ0036510-33	6/00/95	Document titled "Zoladex Reimbursement Hotline Activity Report – June 1, 1995 – June 30, 1995" prepared for Zeneca Pharmaceuticals by State & Federal Associates Inc.	FRE 802
38	AZ0105879-881		Letter from Chris Bowman to Members of the "Maricopa Urology Lithotripsy Inc." Group	FRE 402
39	AZ0096359		Letter from Chris Bowman to Sheila	FRE 402
40	AZ0464087	9/13/00	E-mail from John Freeberry to Julie-Ann Tracy	No Objection
41	AZ0445640-641	6/29/01	E-mail from Barnabas Desta to David Meddis	No Objection
42	AZ0407062-065	00/00/02	Sales Representative Call Notes	FRE 402
43	AZ0431262-71		AstraZeneca Pharmaceuticals Agreement	No Objection
44	AZ0237164-69	11/20/95	Internal Memorandum to Chris Iacono from Keith Patterson	No Objection
45	AZ0024479-81	1/19/96	Internal Memorandum to Chris Iacono from Keith Patterson	No Objection
46	AZ0011640	9/10/96	September 10, 1996 letter from M. Painter to M. Reisenauer	FRE 802
47	AZ0011635-36	4/28/97	Letter from M. Painter to T. Arenson	FRE 802

Ex.	Prod. No.	Date	Description	Objections
48	PXL01258-66	8/6/96	Fax from C. Ware to M. Reisenauer	No Objection
49	HOWE0052-57		Patient Financial History Prepared by Oregon Urology Specialists	FRE 802 FRE 901 FRE 1006
50	HOWE0120		Billing Statement to Mr. Howe	FRE 402 FRE 802 FRE 901
51	HOWE0020-21		Medicare Summary Notice	FRE 106 FRE 402 FRE 802 FRE 901
52	HOWE0010		Cancelled Check #3995 for \$118.81 Made Out to Oregon Urology Specialists	FRE 402 FRE 901
53	TOWN500-503		Patient Financial History Report	FRE 802 FRE 901 FRE 1006
54	TOWN0001-2		Cancelled Checks Made Payable to Mr. Townsend's Urologist, Dr. E. Richard Grieco	FRE 901
55	TOWN 0056		Medicare Summary Notice	FRE 106 FRE 802 FRE 901
56	AZ0702243-46	10/16/04	Email of Erik Schultz	FRE 402
57	AZ 0044059-63	10/13/95	Letter to Mark J. Harberberger from William C. Lucas	FRE 402 FRE 403
58	ABT 48686-96	12/18/95	Letter from Mark J. Harberberger to William C. Lucas	FRE 402 FRE 403 FRE 802 FRE 901
59	ABT 48560-76	9/26/95	Letter from Mark J. Harberberger at Abbott to Glenn M. Engleman at AstraZeneca	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
60		6/4/03	Corporate Integrity Agreement between AstraZeneca and the Office of Inspector General of the Department of Health & Human Services, signed by AstraZeneca	FRE 402 FRE 403
61	AZ0491331-43	2/10/03	CMS Account Team Kickoff Meeting	FRE 402 FRE 403
62	AZ0037011	4/12/95	Internal Memorandum from Ruth Beedle re: Zoladex Profitability	FRE 402
63	AZ0037036-48	9/5/95	Internal Memorandum from Tom Chen to Mike Bonney re: Zoladex Sample Inventories	FRE 402 FRE 403
64	AZ0010307-09	4/6/96	Memorandum to Keith Patterson from Tom Chen re: TAP Response to Zoladex Case Quantity Discount	No Objection
65	AZ0036661	5/7/96	Memorandum to Mark Reisenauer, Tom Chen from Paula Jordon re: Payer Education Mailings	No Objection
66	AZ0577665-71	6/24/99	Cost and Suggested List	No Objection
67	AZ0431261-71	6/24/02	Email from Nancy Jones to Holle Terkhorn re: Annual Buy Group Zoladex Contract Template	No Objection
68	AZ0461415-65	6/2/00	Urology Portfolio Strategic Plan – TALT Update	No Objection
69	AZ0004616-38		Zoladex Strategic Summary – 1998-2002 by Keith Patterson	No Objection
70	AZ0682890-907	00/00/03	Zoladex 2003 EFAR Forecast	No Objection
71	AZ0689131-37	12/22/03	Email from Kathryn Jones re: Data to Support Additional Payment for Part B Drugs in 2004	No Objection

Ex.	Prod. No.	Date	Description	Objections
72	AZ0426351-357	12/29/98	Letter to Eric Kraeutler from Michael Little with enclosed Subpoena to Zeneca, Inc.	FRE 402 FRE 403
73	AZ0464456	1/00/02	Pricing News	No Objection
74	AZ0707711-34		Zoladex Market Pricing	No Objection
75	AZ0462355-56	4/4/00	Email from Joan McDevitt re: Revised AZ Competitors Report	No Objection
76	AZ0425763-769	5/10/02	Fax to Eric Kraeutler from Margaret Mackey; Letter to Recipient of Subpoena from Donald K. Stern; Subpoena to Zeneca, Inc.	FRE 402 FRE 403
77	AZ0005740-41	8/21/96	Internal Memorandum from Mark Reisenauer to Steve Strand re: Zoladex Pricing Recommendations	No Objection
78	AZ0013233-35	10/24/96	Internal Memorandum from Mark Reisenauer to Keith Patterson and Steve Strand re: Zoladex Price Increase Recommendation	No Objection
79	AZ0437058-60		LHRH Cost Comparison	FRE 106 FRE 402
80	AZ0437062		Patient on 4 10.8mg Injections	FRE 106 FRE 402
81	AZ0422502-13	4/30/97	Internal Memorandum from Product Management Team for Zoladex to Oncology Care Representatives & Area Business Specialists re: New Options for Credit Card Payments for Zoladex	No Objection
82	AZ0431073	1/12/99	Draft Letter to Physician from Kulda & Heisey re: Zoladex Price Increase	No Objection
83	AZ0694210-65	04/00/03	Office of Inspector General – Compliance Program Guidance for Pharmaceutical Manufacturers	FRE 402 FRE 403

Ex.	Prod. No.	Date	Description	Objections
84	PTX01034	1/19/95	Letter to Enid Olayan from Carol Ware	No Objection
85	PXL05552-602	8/20/93	Letter to Keith Patterson from Carol Ware enclosing report on Zoladex calls	No Objection
86	PXL05638-991	2/23/94	Letter to Keith Patterson from Carol Ware enclosing report on Zoladex calls	No Objection
87	PXL06067-594	2/23/96	Letter to Keith Patterson from Carol Ware enclosing report on Zoladex injuries [sic]	No Objection
88	PXL01037	1/20/95	Fax from Carol Ware to Medicare Part B Carrier	No Objection
89	AZ0036923-26	6/14/96	Memo to Mike Murray from Carol Ware re: CIGNA Medicare Bulletin	No Objection
90	AZ0021569-71	6/17/96	Fax to Keith Patterson & Mark Reisenaur from Carol Ware re: Colorado Medicare Part B	No Objection
91			Zoladex Label	FRE 402 FRE 403
92			Zoladex Labeling	FRE 402 FRE 403
93			Lupron Depot 4-Month (30mg) Advantages	FRE 402 FRE 403 FRE 901
94		4/10/98	Letter to Annual Contract Customer from Kathleen Sailer & Earl Heisey	No Objection
95			Zoladex Annual Contract	No Objection
96			Invoice	FRE 402
97	AZ0487753-56	2/1/93	Suggested List Prices and Marketing Policy	FRE 402
98	AZ0427978-85	6/2/98	U.S. Wholesale Druggists Cost and Suggest List Prices	No Objection
99	AZ0018042-44	11/4/96	Internal Memorandum from Mark Reisenauer to Bob Black & Jim O'Shea re: Zoladex Price Increase Recommendation	No Objection

Ex.	Prod. No.	Date	Description	Objections
100	AZ0096314		1-Month Depot Zoladex	FRE 402
101	AZ0096386-88	9/26/95	Memo to Gary Hansen from Chris Bowman re: NSS- "Purchase Groups"	FRE 402
102	AZ0096255-59	8/29/97	Email from Christopher Bowman re: Updated "Cheat Sheets"	FRE 402
103	AZ0096293		Draft Letter to Ben from Chris Bowman	FRE 402
104	AZ0428238-62		Zoladex Strategic Summary 1997-2001 prepared by Keith Patterson	No Objection
105	AZ0004734-55	4/20/95	Zoladex Strategic Plan 1996-2000 – Draft #1 by Keith Patterson	No Objection
106	AZ0010334-37	1/12/95	Memorandum to Chris Iacono from Keith Patterson re: Zoladex Pricing Strategy	No Objection
107	AZ0010297-302	3/1/95	Memorandum to William Simpson from Keith Patterson re: Zoladex Pricing	No Objection
108	PXL 06595-661	12/27/96	Letter to Keith Patterson from Sean Coakley & Stephanie Wagoner	No Objection
109	PXL01040	2/15/95	Letter to Travelers Railroad Medicare from Sean Coakley	No Objection
110	PXI01045	2/23/95	Letter to Ms. Rita Crook, North Carolina Medicare Part B from Sean Coakley	No Objection
111	PXL01111-13	5/2/96	FOIA request to Kelly Gross, Blue Shield of California from Sean Coakley	No Objection
112	PXL01116	5/14/96	Letter to Medicare Part B Claims Review from Sean Coakley	No Objection
113	PXL01731-34	7/9/96	Letter to Laura Brooks from Sean Coakley re: Pricing for Zoladex 3.6 mg (goserelin acetate implant) – HCPS J9202	No Objection

Ex.	Prod. No.	Date	Description	Objections
114	PXL01702-11	8/8/96	Letter to Irene Michel, Minnesota Medicare Part B from Sean Coakley	No Objection
115	AZ0425772-73	03/28/02	Letter to John C. Dodds, Esq. From Beth Mowkow-Schnoll, ASUA	FRE 402 FRE 403
116	AZ0419345-48		Medicare Review	No Objection
117	AZ021838	10/12/95	Internal Memorandum from Thomas Chen to Keith Patterson re: Price Increase for Zoladex	No Objection
118	AZ0080407-11	11/20/95	Internal Memorandum from Keith Patterson to Chris Iacono re: Zoladex Pricing	No Objection
119	AZ0376204-17		AstraZeneca Urology Representative Training	No Objection
120	AZ0096241-42	12/5/97	Email from John Armstrong re: Zoladex Spreadsheet	FRE 402
121	AZ0413687-91	3/7/02	Fax to Soleil Chavoshi from John Armstrong re: Competitive Pricing	No Objection
122	AZ0423944-50		LHRH Cost Comparison	FRE 402
123	AZ0432026-34	3/13/01	Email from John Freeberry re: Change in AWP Spread	No Objection
124	AZ0449836-50	8/9/00	Email from John Freeberry to Joan McDevitt Re: Redbook	No Objection
125	AZ0438780-81	1/17/00	Email from Kenneth Smith re: Comparison of 3 month Zoladex & 3 month Lupron (New AWP & Pricing)	FRE 402
126	AZ0016060-74		Proposed Zoladex Contracting Strategy	No Objection
127	AZ0044002-13	1/26/96	Zoladex 3-Month 10.8mg Depot Pricing Proposal	No Objection
128	AZ0024179-90	00/00/95	Zoladex Prostate Cancer 1995 Operational Plan	No Objection
129	AZ0021833	11/14/95	Internal Memorandum to Keith Patterson from Chris Iacono re: Zoladex	No Objection

Ex.	Prod. No.	Date	Description	Objections
130	AZ0040464	11/4/97	Internal Memorandum to C. J. Iacono from M. L. Rickards re: 1998 Pricing Recommendations – Prostate Cancer Portfolio	No Objection
131	AZ0000134-43		Zoladex Strategic Plan 1993-1997	No Objection
132	AZ0097294-95	6/24/97	Email from John Armstrong to Timothy Arenson re: 1998 Price Positioning	No Objection
133	AZ0095847-53	11/5/97	Email from John Armstrong to Jean Ludwig, Kenneth Smith and John Wawrzonek re: Zoladex vs. Lupron Cost & Profit Comparison	FRE 402
134	AZ0044713-14	11/3/97	Email from Dean McAlister to Timothy Arenson re: Response: ZOLPRICE93.xls	No Objection
135			Call Notes	FRE 402
136	AZ0010394-99	3/3/94	Memorandum from Keith Patterson to W.J. O'Shea re: Zoladex Quantity Discount Recommendations	No Objection
137	PXL03686-715		Guide to Coverage and Reimbursement	No Objection
138	AZ0000062-85	6/21/94	Draft #1 Zoladex Strategic Plan 1995-1999	No Objection
139	AZ0427246-65	7/7/97	Proposed Zoladex Contracting Strategy	No Objection
140	AZ0032538-43	2/17/95	Memorandum to William Simpson from Keith Patterson re: Zoladex Pricing	No Objection
141	PXL02766-812		Zoladex Coverage & Reimbursement Physician's Office Guide	No Objection
142	AZ0428327-50		Zoladex Strategic Summary 1998-2002	No Objection

Ex.	Prod. No.	Date	Description	Objections
143	AZ0017131-36	1/23/96	Internal Memorandum from Keith Patterson to Chris Iacono re: Zoladex Pricing Recommendations	No Objection
144	AZ0021679-81	12/2/96	Internal Memorandum from Mark Reisenauer re: Zoladex Price Increase	No Objection
145	AZ0022136-46	2/00/96	US Business Review – February 1996 – Zoladex prepare by Keith Patterson	No Objection
146	PXL00095-96	7/17/96	Memo to Keith Patterson, Mark Reisenauer, Tom Chen from Howard Tag re: Medicare Reimbursement	No Objection
147	AZ0010338-39	1/19/95	Internal Memorandum from Keith Patterson to Chris Iacono re: Zoladex Pricing	No Objection
148	AZ0715813-943		Price Analysis	No Objection
149	AZ0463627-29	1/28/02	Email from Jill Krating to Erik Schultz re: NEW PDF of Pricing News	No Objection
150	AZ0464857-59	3/1/02	Email from Erik Schultz to Jill Krating re: AWP Spread	No Objection
151	AZ0373269	3/17/97	Fax to Frederick Hollon, M.D. from Jack Wawrzonek	FRE 402
152	AZ0096737-38	12/1/97	Fax to Jeffrey Frankel, M.D. from Jack Wawrzonek re: Zeneca Annual Zoladex Contract	FRE 402
153	AZ0094769	9/5/97	Email from Cathy Chakos to Kenneth Smith & John Wawrzonek re: Fay Alliance	FRE 402
154	AZ0437244-47	3/30/99	Email from John Wawrzonek to Todd Orsi re: Annual Contract	FRE 402
155	AZ0373195		AstraZeneca Code of Conduct (CD)	No Objection
156			Video Deposition of Dr. Robert A. Berkman	FRE 402 FRE 403

Ex.	Prod. No.	Date	Description	Objections
157		02/14/06	Video Deposition of David Brennan	No Objection
158		4/4/06	Amended Version of AstraZeneca Pharmaceuticals LP's and Zeneca, Inc.'s Responses to Plaintiff's Interrogatories and Requests for Admission in Montana	FRE 402
159	AZ0463307	04/09/99	Email from John Freeberry to David Brennan re: Current Pricing Issues	No Objection
160	AZ0048992-9023	01/15/91	1991 Zoladex Promotional Plan	No Objection
161	AZ0037020-21		Draft Advertisement for Zoladex	No Objection
162	AZ0008092-119	00/00/92	Zoladex Medical/Marketing Operating Plan 1992	No Objection
163	AZ0048961-8091	00/00/94	Zoladex Prostate Cancer 1994 Operational Plan	No Objection
164	AZ0009978-91	00/00/95	Zoladex Prostate Cancer 1995 Operational Plan	No Objection
165	AZ0004273-84	00/00/97	Advanced Prostate Cancer 1997 Operational Plan for Zoladex 3.6MG and 10.8MG and Casodex	No Objection
166	AZ0033814-40	10/1/97	1998 Operational Plan for Casocex [sic] & Zoladex	No Objection
167	AZ0001598-603	1998	Prostate Cancer 1998 Operational Plan for Casodex & Zoladex with Handwritten Notes	No Objection
168	AZ0427138-783	1999	1999 Operational Plan for The Prostate Cancer Portfolio – Casodex & Zoladex	No Objection
169	AZ0432467-80	4/29/02	Email from Connie McDonough to Kathryn Jones re: Zoladex 2003 Product Strategic Plan	No Objection

Ex.	Prod. No.	Date	Description	Objections
170	AZ0008130-50	1992-94	Zoladex Medical/Marketing Operational Plan	No Objection
171	AZ0008087-91	1994	Zoladex Medical Marketing Operational Plan	No Objection
172	AZ0008069-86	1995	Pharma Deliverables Report – Zoladex Medical Marketing Operational Plan	No Objection
173	AZ0024003-10	8/16/95	Zoladex 3.6mg and 10.8mg Prostate Cancer 1996 Operational Plan – Draft #1	No Objection
174	AZ0385646	6/25/00	Call Notes from Dana Nevil, AZ Sales Representative	FRE 402
175	PXL00955-67	1/13/99	Letter from Fred Roberts to Marci Calli attaching an 1998-99 executed contract between Parexel & AstraZeneca	No Objection
176	AZ0096323		“An Evening With Ray Painter, M.D.”	FRE 402
177	AZ0237533-36	12/06/91	Letter to Maureen McShane from Robert J. Shaughnessy re: ICI Americas Inc. Response to TAP Pharmaceuticals /Abbott Laboratories Letter of October 21, 1991	FRE 402
178	ABT 48560-76	09/26/95	Letter to Glenn Engelmann from Mark J. Haberberger re: Illegal and/or Fraudulent Zeneca Marketing Activities	FRE 402 FRE 403 FRE 802 FRE 901
179	AZ0427138-183	00/00/99	1999 Operational Plan for The Prostate Cancer Portfolio Casodex & Zoladex	No Objection
180	AZ0413739-742	11/28/00	Email from Dean McAlister to Soheil Chavoshi & John Krukiel re: Provider Response: Tap Care & Cigna AZ	No Objection

Ex.	Prod. No.	Date	Description	Objections
181	AZ0431325-326	09/24/99	Email from Maureen Gillick to Julie Doll re: Reimbursements for Zoladex vs. Lupron	No Objection
182		05/3/03	<i>OIG Compliance Program Guidance for Pharmaceutical Manufacturers</i> , 68 Fed. Reg. 23731 (May 3, 2003)	FRE 402 FRE 403
183	BMS/AWP/000192875-76	1/30/01	Email from Janine Suscewicz re: Message from Ed Penick attaching a 1/26/01 Executive Memorandum from E. Penick to U.S. Sales & Marketing Personnel re: Media Coverage – Pharmaceutical Pricing Practices	FRE 402 FRE 403 FRE 802 FRE 901
184	AZ0391087		Call Notes	No Objection
185	AZ0388709-11		Call Notes	No Objection
186	AZ0689806-21	8/21/97	Fax from Dayne Bauman to Mary Ann Romano	No Objection
187	AZ0037018-19	03/22/95	Memo to Specialty Care Representatives from Oncology Specialty Marketing Team re: New Case Quantity Discount	No Objection
188		06/20/03	Press Release from the Department of Justice: “AstraZeneca Pharmaceuticals LP Pleads Guilty to Healthcare Crime; Company Agrees to Pay \$355 Million to Settle Charges	FRE 402 FRE 403 FRE 408
189	TOWN 0058	10/11/00	Medicare Summary Notice	FRE 106 FRE 802 FRE 901
190	TOWN 0060	04/04/01	Medicare Summary Notice	FRE 106 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
191	TOWN 0223	12/28/00	Medicare Summary Notice	FRE 106 FRE 802 FRE 901
192	TOWN 0317	02/06/02	Medicare Summary Notice	FRE 106 FRE 802 FRE 901
193			Billing Records of Mr. Townsend's urologist, Dr. Grieco	FRE 802 FRE 901 FRE 1006
194		3/14/02	Testimony of Thomas A. Scully, Administrator of Centers for Medicare & Medicaid Services, on Reimbursement & Access to Prescription Drugs under Medicare Part B, Senate Finance Committee, Subcommittee on Health	No Objection
195		12/6/01	Sentencing Memorandum of the United States. <i>United States v. TAP Pharmaceutical Products, Inc.</i> , No. CR-01-10354-WGY (D. Mass. Dec. 6, 2001)	FRE 402 FRE 403
196		12/6/01	<i>United States v. TAP Pharmaceutical Products, Inc.</i> , No. CR-01-10354-WGY (D. Mass. Dec. 6, 2001) – Disposition	FRE 402 FRE 403
197	TAP 5030224-458		Document titled "Big Mac Attack – Coach's Playbook"	FRE 402 FRE 403 FRE 802 FRE 901
198		9/28/00	Letter from the House of Representative Committee on Ways and Means, Subcommittee on Health, to President of the Pharmaceutical Research and Manufacturers of America	No Objection

Ex.	Prod. No.	Date	Description	Objections
199		10/31/00	Letter from Congressman Stark to Commissioner of the Food and Drug Administration	No Objection
200		12/6/00	Letter from Congressman Stark to Chief Counsel to the HHS Inspector General dated December 6, 2000; and Letter to Nancy-Ann Min DeParle from Thomas Bliley	No Objection
201	PXL06662-725 PXL04626-96 PXL04697-763 PXL04764-824 PXL04825-90 PXL04891-949 PXL04950-5003 PXL05004-65 PXL05117-69 PXL07273-334 PXL05232-328		Reimbursement Hotline Monthly Reports Prepared by Parexel for 1997	No Objection
202	PXL02832-36	3/92	Zoladex Hotline & Payer Advocacy Activity Prepare for ICI Pharma by State & Federal Associates Inc.	No Objection
203	PXL045495-509	3/16/93	Letter to J.R. Hildreth from Beatrice Jordean enclosing the report on calls received from by the Zoladex Hotline for February 1993	No Objection
204	PXL01220-21	7/19/93	Letter to Karen Simon, R.N. from Beatrice Jordan	No Objection
205	PXL05684-718	4/25/94	Letter to Keith Patterson from Carol Ware enclosing the report received by the Zoladex Hotline for March 1994	No Objection

Ex.	Prod. No.	Date	Description	Objections
206	PXL05821-46	8/19/94	Letter to Keith Patterson from Carol Ware enclosing the report on calls received by the Zoladex Hotline for July 1994	No Objection
207	PXL05997-6007	6/00/95	Overview Activity June 1, 1995 – June 20, 1995	No Objection
208	PXL00064-66; PXL01118-20; PXL01366; PXL01371; PXL01369-70; PXL01367-68; PXL01258-66	6/17/96	Various Documents Regarding Grant Steffen	No Objection
209	AZ0033347-51	9/12/96	Memo from Marybeth Farrell re: Legislative Policy Committee Meeting August 20, 1996	No Objection
210	AZ0427483-87	2/13/97	Fax to Medicare Reimbursement Team from Stephen McMillan attaching memo to Barry Caldwell from Gary Persinger	No Objection
211	AZ0019359-62	4/24/97	Memo from Keith Patterson to MaryBeth Farrell re: Impact of Medicare Reimbursement Changes	No Objection
212	AZ0417794-832	5/13/97	Internal Memo from MaryBeth Farrell to Legislative Policy Committee Medicare Reimbursement Committee re: Medicare Reimbursement Team Report: Business Impacts of Policy Changes	No Objection
213	AZ0416417-19	3/18/98	Internal Memo from J. Schlicht & S. McMillan to S. Harrison re: Presentation to the Marketing Strategy and Contract Operations Group	No Objection

Ex.	Prod. No.	Date	Description	Objections
214	AZ0416877-99	1/5/99	Memo to the Members of the Federal Health Care Legislation KIT Staff Work Group re: Materials for Tomorrow's Federal Health Care Legislation KIT Meeting	No Objection
215	AZ0424501		Zoladex (goserelin acetate implant) Reimbursement History	FRE 402
216	AZ0416601-03	06/12/00	Report to the Executive Committee on Other Federal Legislative & Regulatory Developments	No Objection
217	AZ0414607-41	8/00	Pharma Pricing & Reimbursement – August 2000 Vol. 5, Number 8	FRE 402 FRE 802
218	AZ0488721-32	9/21/01	Congressional Hearing Report re: “Medicare Drug Reimbursements: A Broken System for Patients and Taxpayers”	No Objection
219	AZ0683398-400	1/15/01	Email chain forwarding letter from Tauzin, Bilirakis & Greenwood to Scully	No Objection
220	AZ0683856-66	10/3/02	67 Fed. Reg. 62057 (Oct. 3, 2002) with draft OIG guidelines	FRE 402 FRE 403
221	PXL01825	3/15/94	Memo from Director of Office of Payment Policy to All Associate Regional Administrators for Medicare re: Determination of Acquisition Cost of Drugs	No Objection
222	AZ0416401-02	10/9/00	Letter from Alan F. Holmer to Congressman Pete Stark	No Objection
223	AZ0488687-720		GAO Draft Report: Medicare Payments for Covered Outpatient Drugs Exceed Providers' Cost	No Objection

Ex.	Prod. No.	Date	Description	Objections
224	AZ0488680-86	9/21/01	Testimony of Thomas A. Scully Administrator Centers for Medicare & Medicaid Services on Medicare Payment for Drugs House Energy & Commerce Subcommittees on Oversight & Investigations and Health	No Objection
225	AZ0488615-27		Testimony before Subcommittees on Health & Oversight & Investigations Committee on Energy and Commerce – Hearing on Medicare Drug Reimbursement: A Broken System for Patients and Taxpayers	No Objection
226	AZ0488656-63	9/21/01	Testimony of George F. Grob Deputy Inspector General for Evaluation and Inspections HHS Office of Inspector General	No Objection
227	PXL01215-16	6/23/94	Memo to Keith Patterson from Sandy Robinson re: Medicare Carrier Survey of Drug Acquisition Prices	No Objection
228	AZ0416840	2/6/98	Memo from Steve Cole Announcing a Meeting of the Medicare Committee on February 11, 1998	No Objection
229	www.astrazeneca-us.com/content/aboutAZ/astrazeneca-our-company.asp	3/12/07	AstraZeneca Website “Our Company – Healthcare for People. Imagine That.”	FRE 106
230		7/26/04	AstraZeneca’s Objections and Responses to Plaintiffs’ Interrogatories to the Fast Track Defendants	No Objection

Ex.	Prod. No.	Date	Description	Objections
231			Page from CMS Website “Pharmaceutical Pricing Issues – AMP/AWP”	FRE 106
232	FDB-AWP-16989-96	7/2/01	Fax to First DataBank from Sandra Bell re: Revised Prices	FRE 402
233	WKH77797-801	2/13/97	Price Change Notifications	FRE 402 FRE 403 FRE 802 FRE 901
234	WKH02434-38	1/6/98	Urgent – Price Change Information	FRE 402 FRE 403 FRE 802 FRE 901
235	WKH02446-47	1/7/00	Price Change	FRE 402 FRE 403 FRE 802 FRE 901
236		12/3/06	Reimbursement Issues with Hormonal Therapies for Prostate Cancer with M. Ray Painter from the Urology Journal Website	No Objection
237	AZ0052706-07	5/23/94	Memo to Keith Patterson, Cyndee Davies and Dave Shoup from Sandy Robinson re: HCFA Request for Acquisition Cost Information	No Objection
238	PXL01210-14	7/21/94	Memo to Keith Patterson from Karen Wilson re: Memos from ASCO Concerning Medicare Survey of Drug Acquisition Costs	No Objection
239	TAP GB 08146	6/8/94	Memo to Alan MacKenzie from Dolly Hanrahan re: Medicare Proposal	FRE 402 FRE 403 FRE 802 FRE 901
240	TAP 5080964-68	4/1/97	Administration Days – Lemon - Fax to TAP, Chad Flesher	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
241	TAP 5085632-51		Zoladex Marketing Materials	FRE 402 FRE 403 FRE 802 FRE 901
242	TAP00051966-74	8/29/97	LHRH Proposal for Center for Urology by Zeneca Pharmaceuticals	FRE 402 FRE 403 FRE 802 FRE 901
243	TAP 5085500-05	9/2/97	Fax to Jeff from Arlene attaching Zoldadex Marketing Materials	FRE 402 FRE 403 FRE 802 FRE 901
244	AZ0069688-701	5/1/96	Zeneca Pharmaceuticals Agreement with Urology Network of Central Ohio	FRE 402
245	AZ0022281-94		Medicare Market Segment Strategic Plan – 1997 – 2001 prepare by Rick Mann	No Objection
246	AZ0092152-67	7/23/93	Prostate Cancer Situation Analysis Review prepared by Mark Reisenauer	No Objection
247			Howe Lupron-Zoladex History Chart with back up documents	FRE 402 FRE 802 FRE 901 Late Disclosure
248	TAP 9030665-66	1/24/99	Email from Betsy Coldwell to Carla Smith, Antonina McNulty, Ed Lwe, David Obrochta and Stephanie Phelps re: RTP with attached spreadsheet	FRE 402 FRE 403 FRE 802 FRE 901
249	TAP 9070216-17	4/28/99	Email from Antonina McNulty to Betsy Coldwell, Dan Aboud, Carie Van Tuy, William Foxx and Carla Smith re: Lupron/Zoladex Pricing Schedule with Attacment	FRE 402 FRE 403 FRE 802 FRE 901
250	TAP 9078091-104	7/16/98	Email from Kristen Sgroi to Karen Terradista re: UAOFRO.PPT with attachment	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
251	TAP 9078177-79	1/21/99	Email from Betsy Coldwell to Antonina McNulty re: RTP with attachment	FRE 402 FRE 403 FRE 802 FRE 901
252	TAP 9078184-87	2/3/99	Email from Betsy Coldwell to Antonina McHuntly, David Obrochta, Stephanie Phelps, and Carla Smith re: CYA with attachment	FRE 402 FRE 403 FRE 802 FRE 901
253	TAP RJ 13960-67	9/1/99	Email from Rita Jokiahore: 4 Month Power Point Presentation. Another Selling idea to increase our 4 month conversion with attachment	FRE 402 FRE 403 FRE 802 FRE 901
254		7/21/05	Video Deposition of Christopher Iacono	No Objection
255		6/28/05 & 6/29/05	Video Deposition of Keith Patterson (Disks 1-3 (6/28/05) & Disks 1-2 (6/29/05))	No Objection
256		12/8/05	Video Deposition of Mark Reisenauer	No Objection
257		12/14/05	Video Deposition of Thomas Chen	No Objection
258		6/30/05	Video Deposition of Robert Black	No Objection
259	TOWN 0037-38; TOWN 0040-41; TOWN 0046-66; TOWN 0348; TOWN 0511-12; TOWN 0515-20; TOWN 0523-38; TOWN 0575-94; TOWN 0604-93		Townsend Chart of Lupron/Zoladex History with back up	FRE 106 FRE 402 FRE 802 Late Disclosure
260	ESTES 0001-05		Statements from Maryland Oncology Hematology PA	FRE 402 FRE 802 FRE 901 Late Disclosure
261	ESTES 0006-8	3/6/06	Billing Records from Maryland Oncology Hematology	FRE 402 FRE 802 FRE 901 Late Disclosure

Ex.	Prod. No.	Date	Description	Objections
262	ESTES 0009-14	2/1/07	Billing Records from Maryland Oncology PA and a letter to James Estes from Jacquelyn Kelly dated May 5, 2006	FRE 402 FRE 802 FRE 901 Late Disclosure
263	ESTES 0015-29		Various Medical Records for James Estes	FRE 402 FRE 802 FRE 901 Late Disclosure
264	ESTES 0030	3/6/06	Letter from Margaret Klein to James Estes re Payment to Maryland Oncology Hematology PA	FRE 402 FRE 802 FRE 901 Late Disclosure
265		3/16/06	Attachment A to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	No Objection
266		3/16/06	Attachment B: Documents Cited to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	Late Disclosure
267		3/16/06	Attachment C: Medicare's Resource Based Relative Value Scale to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 702 Late Disclosure
268		3/16/06	Attachment D.1 Through D.3: Review of OIG and Other Industry Reports, D.4: Summary of OIG and Other Available Reports for Medicare Part B and Physician Administered Drugs to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 702 Late Disclosure

Ex.	Prod. No.	Date	Description	Objections
269		3/16/06	Attachment E.1.a: AstraZeneca Annual Average Sales Price to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 702
270		3/16/06	Attachment E.1.b: AstraZeneca Annual AWPs to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 702
271		3/16/06	Attachment E.1.c: AstraZeneca Annual Spreads to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 702
272		3/16/06	Attachment E.1.d: AstraZeneca Total National Net Sales to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 702 Late Disclosure
273		3/16/06	Attachment E.2: AstraZeneca Electronic Data Calculation Notes to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 702
274		3/16/06	Attachment F.1.A: Zoladex Damages for Class 1 Beneficiaries to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 402 FRE 403 FRE 702 Late Disclosure

Ex.	Prod. No.	Date	Description	Objections
275		3/16/06	Attachment F.1.b: Zoladex Damages for Class 1 Beneficiaries by State to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 402 FRE 403 FRE 702 Late Disclosure
276		3/16/06	Attachment F.2.a: Savings on Class 1 Medicare Payments Assuming Reimbursements Based on 106% of ASP to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 402 FRE 403 FRE 702 Late Disclosure
277		3/16/06	Attachment F.2.b: Savings on Class 1 Medicare Payments Assuming Reimbursements Based on 106% of ASP by State to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 402 FRE 403 FRE 702 Late Disclosure
278		3/16/06	Attachment G.1.a: Medicare Reimbursement for Zoladex and Administration Fee (With Transition Fee State to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 402 FRE 403 FRE 702 Late Disclosure
279		3/16/06	Attachment G.1.b: Medicare Reimbursement for Zoladex and Administration Fee (Without Transition Fee) State to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 402 FRE 403 FRE 702 Late Disclosure

Ex.	Prod. No.	Date	Description	Objections
280		3/16/06	Attachment G.1.c: Changes in Medicare Reimbursement for a Typical Administration of Zoladex Including Transition Fee State to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 402 FRE 403 FRE 702 Late Disclosure
281		3/16/06	Attachment G.1.d: Changes in Medicare Reimbursement for a Typical Administration of Zoladex Without Transition Fees State to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 402 FRE 403 FRE 702 Late Disclosure
282		3/16/06	Attachment G.2: Comparison of Direct Testimony ASPs with CMS ASPs State to the Report of Raymond S. Hartman Regarding AstraZeneca With Respect to Class I	FRE 402 FRE 403 FRE 702 Late Disclosure
283		3/16/06	Attachment A to the Report of Dr. Meredith Rosenthal Regarding AstraZeneca and Class 1	No Objection
284		3/16/06	Attachment B to the Report of Dr. Meredith Rosenthal Regarding AstraZeneca and Class 1	Late Disclosure

Ex.	Prod. No.	Date	Description	Objections
285		3/16/06	Exhibit 2: Distribution of Supplementary Health Insurance for the Medicare Population, 1996 Fee-For-Service Enrollees to the Amended Written Tutorial of Dr. Meredith Rosenthal to Reflect Matters Relevant to AstraZeneca and Class 1 Only	Late Disclosure
286	05-22-1179-81; 05-23-1767; 05-23-1769		Call Notes	No Objection
287	SHEPLEY 0017-27		Documents Identifying Zoladex Injections for Shepley	FRE 402 FRE 802 FRE 901
288	MDL-OBI00042743	11/20/01	Memo to Nephrology Field Sales re: Competitive Pricing	FRE 402 FRE 403 FRE 802 FRE 901
289	MDL-CEN00104171-76	6/7/02	RBS Scenario Role Play Talk Track: Final June 7, 2002	FRE 402 FRE 403 FRE 802 FRE 901
290	TAP 5067796-99	1/26/90	RTP comparison of Lupron vs. Zoladex, showing that Lupron yields \$15.00 additional revenue over Zoladex per patient per month	FRE 402 FRE 403 FRE 802 FRE 901
291	TAP 2018443-44	3/11/91	TAP Free Goods Program	FRE 402 FRE 403 FRE 802 FRE 901
292	TAP GB 11677-78	7/29/91	Final Medicare and Medicaid “safe harbor” anti-kickback regulations become effective.	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
293	TAP GB 11677-78	8/13/91	Medicare and Medicaid “safe harbor” anti-kickback regulations become effective.	FRE 402 FRE 403 FRE 802 FRE 901
294	TAP 5035891-94	12/02/91	Memo from Hank Pietraszek (President, TAP)	FRE 402 FRE 403 FRE 802 FRE 901
295	TAP 00095522-23	12/06/91	MacKenzie memo to TAP field personnel	FRE 402 FRE 403 FRE 802 FRE 901
296	TAP 00096700-14	9/00/92	MacKenzie Memo	FRE 402 FRE 403 FRE 802 FRE 901
297	TAP 1004729-43	11/30/92	Memo from Carl Kunkleman to Don Patton and Karen Howard	FRE 402 FRE 403 FRE 802 FRE 901
298	TAP 1057279-344	12/00/92	TAP “Think Urology Facts Book”	FRE 402 FRE 403 FRE 802 FRE 901
299	TAP 0096717-43	00/00/92	Reimbursement Overview Notes	FRE 402 FRE 403 FRE 802 FRE 901
300	TAP 1051032-38	3/1/93	TAP Contingency Plan	FRE 402 FRE 403 FRE 802 FRE 901
301	TAP 5128872-74	6/2/93	Letter to Provider	FRE 402 FRE 403 FRE 802 FRE 901
302	TAP 2018132-55	4/00/93	Nationwide implementation of computerized business reviews by TAP	FRE 402 FRE 403 FRE 802 FRE 901
303	TAP 00096172-75	8/30/93	Analysis of TAP’s Quantity Discount Program	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
304	TAP GB 08166-73; TAP 00133338-45	4/26/94	Zeneca Pharmaceuticals announces the Zoladex Access Program (ZAP) for patients with endometriosis.	FRE 402 FRE 403 FRE 802 FRE 901
305	TAP GB 08429-34	5/4/94	Fax from Abbott to Alan MacKenzie	FRE 402 FRE 403 FRE 802 FRE 901
306	TAP00096098-103	5/5/94	Fax from Dolly Hanrahan to Alan MacKenzie	FRE 402 FRE 403 FRE 802 FRE 901
307	TAP 2016893-902	5/31/94	TAP proposal for a Medicare Compassionate Care Program	FRE 402 FRE 403 FRE 802 FRE 901
308	TAP 2047341-45	6/1/94	Francesca Racette reports on 'Current Managed Care Situations in SoCal'	FRE 402 FRE 403 FRE 802 FRE 901
309	TAP GB 08146-50	6/8/94	Abbott interoffice correspondence to Alan MacKenzie	FRE 402 FRE 403 FRE 802 FRE 901
310	TAP 00095161-70	6/8/94	Letter from MacKenzie to Arthur Goetz (Lupron patient)	FRE 402 FRE 403 FRE 802 FRE 901
311	TAP 5055606-10	7/10/95	Memo from Jim Salanty to Field Sales Force	FRE 402 FRE 403 FRE 802 FRE 901
312	TAP 5077322-23	7/25/94	Daly memo to Lupron Field Sales Force	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
313	TAP GB 08079	7/25/94	Memo from Gina Borkowski to Alan MacKenzie	FRE 402 FRE 403 FRE 802 FRE 901
314	TAP 00096052-53	8/19/94	Memo	FRE 402 FRE 403 FRE 802 FRE 901
315	TAP 1013762-76	11/30/94	Bill McKenna memo to Lolli Sherry	FRE 402 FRE 403 FRE 802 FRE 901
316	TAP 5056816-23	1/10/95	Memo re: Redbook Update	FRE 402 FRE 403 FRE 802 FRE 901
317	TAP GB 08362-63	3/17/95	Memo from Jeff Stewart to Jim Salanty	FRE 402 FRE 403 FRE 802 FRE 901
318	TAP GB 08517-27	6/6/95	Regional Manager Meeting on TAPCARE Program	FRE 402 FRE 403 FRE 802 FRE 901
319	TAP 3009488-99	7/01/95	TAP Lupron Depot 7.5 Contract	FRE 402 FRE 403 FRE 802 FRE 901
320	TAP 5084510-670	7/25/95	Copy of Selling Against Zoladex Presentation	FRE 402 FRE 403 FRE 802 FRE 901
321	TAP 2070221-36	9/26/95	Copy of Letter From Haberberger to Engelmann	FRE 402 FRE 403 FRE 802 FRE 901
322	TAP 5106724-27	9/00/95	'Think Urology' newsletter (Vol. 2, September 1995)	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
323	TAP 2070220	10/9/95	Letter from William C. Lucas (General Counsel, Zeneca) to Mark J. Haberberger (Senior Attorney, Abbott Laboratories)	FRE 402 FRE 403
324	ABT 48680-85	10/13/95	Letter from William C. Lucas (Counsel, Zeneca) to Mark J. Haberberger (Senior Attorney, Abbott)	FRE 402 FRE 403
325	TAP 5034425-26	10/17/95	TAP (Jim Salanty) memo to senior management	FRE 402 FRE 403 FRE 802 FRE 901
326	ABT 48677-79	10/27/95	Haberberger Letter to Lucas	FRE 402 FRE 403 FRE 802 FRE 901
327	TAP GB 09866-78	11/21/95	Memo from Carrie Nutt to Field Sales Force	FRE 402 FRE 403 FRE 802 FRE 901
328	ABT 48551-54; ABT 48550; ABT 48547-48; ABT 48549	12/18/95	Letter from Mark J. Haberberger to William C. Lucas	FRE 402 FRE 403 FRE 802 FRE 901
329	TAP 2007768-91	00/00/95	TAP Business Unit 1995-1999 Long Range Plan (LRP)	FRE 402 FRE 403 FRE 802 FRE 901
330	TAP 9073175-79	1/16/96	Memo from Karen Howard re 'Reimbursement Experience Program'	FRE 402 FRE 403 FRE 802 FRE 901
331	TAP 0004346-48	1/19/96	TAP Holdings, Inc., 1996-2000 Revised Long Range Plan (LRP) Business Overview/Summary	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
332	TAP 5050275-81	1/26/96	Zeneca Price Increase	FRE 402 FRE 403 FRE 802 FRE 901
333	TAP 9073158-67	2/1/96	Memo from Karen Howard to Don Patton et al.	FRE 402 FRE 403 FRE 802 FRE 901
334	TAP 5032859-55	4/1/96	New Hire Training Manual	FRE 402 FRE 403 FRE 802 FRE 901
335	TAP 5035816-18	7/9/96	Zoladex Sales Representative Memo	FRE 402 FRE 403 FRE 802 FRE 901
336	TAP 00065944	9/23/96	E-mail from Ed Rozanski to T.J. Sheehan and Nancee Stiver	FRE 402 FRE 403 FRE 802 FRE 901
337	TAP-BLI 0019598-600	1/1/97	Zeneca Price Increase	FRE 402 FRE 403 FRE 802 FRE 901
338	TAP 00065904	1/3/97	Call Notes of New Jersey Uro Net	FRE 402 FRE 403 FRE 802 FRE 901
339	TAP2007403-23	1/17/97	TAP Holdings long range plan (LRP) 1997-2000	FRE 402 FRE 403 FRE 802 FRE 901
340	TAP-BLI 0079996-80010	1/28/97	TAP (R. Masterson) Reimbursement Contingency Plan	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
341	TAP 9065351-52	2/20/97	TAP (Tanya Gross) Report	FRE 402 FRE 403 FRE 802 FRE 901
342	TAP 1055735-36	2/27/97	Marketing Research	FRE 402 FRE 403 FRE 802 FRE 901
343	TAP 5102031-33	3/00/97	March 1997 Lupron District Managers Report from Lou Savant to Joe Luminiello	FRE 402 FRE 403 FRE 802 FRE 901
344	TAP 5017394-406	3/14/97	TAP (Robin Powers) memo to TAP management	FRE 402 FRE 403 FRE 802 FRE 901
345	TAP2011610	4/00/97	TAP Memo	FRE 402 FRE 403 FRE 802 FRE 901
346	TAP 00049409-10	5/13/97	Affiliated Urology Memo	FRE 402 FRE 403 FRE 802 FRE 901
347	TAP 5080955-56	5/16/97	TAP Sales Representative Report	FRE 402 FRE 403 FRE 802 FRE 901
348	TAP 5060766-75	7/31/97	Zoladex Pricing Sheet	FRE 402 FRE 403 FRE 802 FRE 901
349	TAP 2047004-06	8/7/97	TAP Holdings, Inc. LCA Update	FRE 402 FRE 403 FRE 802 FRE 901
350	TAP 1056616-18	8/15/97	TAP Holdings, Inc. Memo	FRE 402 FRE 403 FRE 802 FRE 901
351	TAP 5041020-27	11/4/97	TAP Meeting	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
352	TAP 2033272-442	11/4/97	TAP Holdings, Inc. 1998 Plan	FRE 402 FRE 403 FRE 802 FRE 901
353	TAP 5059776-84	12/23/97	Zoladex Pricing Sheet	FRE 402 FRE 403 FRE 802 FRE 901
354	TAP 9015068-86	1/12/98	Zeneca Program	FRE 402 FRE 403 FRE 802 FRE 901
355	TAP 9037636-37	1/22/98	Michele Versluis and Jim Salanty memo	FRE 402 FRE 403 FRE 802 FRE 901
356	TAP 9086897-901	1/25/98	TAP sales representative (Jeffrey Rowell) memo	FRE 402 FRE 403 FRE 802 FRE 901
357	TAP 9086970-73	1/31/98	DM Bill McAlpine Memo	FRE 402 FRE 403 FRE 802 FRE 901
358	TAP-BLI 008743-57	2/10/98	Zeneca Contract Document	FRE 402 FRE 403 FRE 802 FRE 901
359	TAP 9078085-87	2/23/98	DM Barbara Tolbert memo	FRE 402 FRE 403 FRE 802 FRE 901
360	TAP 9082382-85	2/26/98	DM Bill McAlpine report	FRE 402 FRE 403 FRE 802 FRE 901
361	TAP 9055245-47	3/11/98	TJ Sheehan and Jim Salanty memo	FRE 402 FRE 403 FRE 802 FRE 901
362	TAP RJ 11692-95	4/00/98	Rita Jokiaho's Monthly Activity Report for April 1998	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
363	TAP 9083316	6/29/98	Michael Hughes (SGA) report	FRE 402 FRE 403 FRE 802 FRE 901
364	TAP 9030722	7/15/98	TAP Memo	FRE 402 FRE 403 FRE 802 FRE 901
365	TAP RJ 25878-82	7/25/98	TAP sales representative (Michael Ronning) memo	FRE 402 FRE 403 FRE 802 FRE 901
366	TAP 9050596-603	9/04/98	Report on Mayo Clinic	FRE 402 FRE 403 FRE 802 FRE 901
367	TAP 1058677-79	00/00/98	1998 Marketing Plan	FRE 402 FRE 403 FRE 802 FRE 901
368	TAP-BLI 0083129-31	00/00/99	Memo from Don Patton to Tom Watkins (President, TAP)	FRE 402 FRE 403 FRE 802 FRE 901
369	TAP RJ 11676-79	03/00/99	Rita Jokiahho Monthly Activity Report for March 1999	FRE 402 FRE 403 FRE 802 FRE 901
370	TAP-BLI 0050998-1001	4/12/99	Memo re Florida	FRE 402 FRE 403 FRE 802 FRE 901
371	TAP 9048257-61	7/01/99	TAP Memo re California	FRE 402 FRE 403 FRE 802 FRE 901
372	TAP-BLI 0006433-36	12/30/99	Memo re Zoladex	FRE 402 FRE 403 FRE 802 FRE 901
373	TAP-BLI 0082896-97	1/15/00	TAP modification to its Annual Purchase Commitment Contracts (APCC)	FRE 402 FRE 403 FRE 802 FRE 901

Ex.	Prod. No.	Date	Description	Objections
374	TAP 11000143-47	5/5/00	Congressman Tom Bliley writes letter to Thomas Watkins (President, TAP Holdings, Inc.)	FRE 402 FRE 403 FRE 802 FRE 901
375	TAP 11000226-28	6/22/00	TAP responds to Congressman Bliley's letter	FRE 402 FRE 403 FRE 802 FRE 901
376		9/28/01	TAP Guilty Plea	FRE 402 FRE 403
377	TAP 2018854-55	8/25/92	Memo from Jeff Peterson to Field Sales Force	FRE 402 FRE 403 FRE 802 FRE 901
378		10/6/05	Letters to AstraZeneca from Hagens Berman Sobol Shapiro providing Notice pursuant to Cal. Civil Code § 1782; Georgia Code § 10-1-399; Indiana Code § 24-5-0.5-5(a); Maine Revised Statutes, Title 5, § 50-634(g); Mass. Gen. Laws Ch. 93A, § 9(3); Texas Bus. & Commercial Code § 17.505; West Virginia Code § 46A-6-106(b); and, Wyoming Statutes § 40-12-109	No Objection
379		11/17/05	Demand Letter to AstraZeneca from Hagens Berman Sobol Shapiro	No Objection
380		3/27/07	Demand Letter to AstraZeneca from Hagens Berman Sobol Shapiro	No Objection

Ex.	Prod. No.	Date	Description	Objections
381		3/28/07	March 28, 2007 Addendum to the Report of Raymond Hartman: Table 1: Zoladex Damages for Medicare Beneficiaries (Consumers) Paying Coinsurance Under Private Third-Party Supplemental Insurance	FRE 402 FRE 403 FRE 702 Late Disclosure
382		3/28/07	March 28, 2007 Addendum to the Report of Raymond Hartman Table 2: Zoladex Damages for Medicare Beneficiaries (Consumers) Paying Coinsurance Under Private Third-Party Supplemental Insurance by State	FRE 402 FRE 403 FRE 702 Late Disclosure

Respectfully submitted,

By: /s/ Katherine B. Schmeckpeper
 Nicholas C. Theodorou (BBO # 496730)
 Michael P. Boudett (BBO # 558757)
 Katherine B. Schmeckpeper (BBO # 663200)
 FOLEY HOAG LLP
 155 Seaport Boulevard
 Boston, Mass. 02210

D. Scott Wise
 Michael Flynn
 Kimberley Harris
 Davis Polk & Wardwell
 450 Lexington Avenue
 New York, N.Y. 10017

Attorneys for AstraZeneca Pharmaceuticals LP

Dated: April 4, 2007

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered on April 4, 2007 to counsel for plaintiffs and to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, via LexisNexis File & Serve.

By: /s/ Katherine B. Schmeckpeper
Katherine B. Schmeckpeper (BBO# 663200)